

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT STATEMENT OF BASIS

Federally Enforceable Conditional Major Permit, No. F-03-008

Bakery Feeds, Inc.

Henderson Plant

221 Heilman Street

Henderson, Kentucky 42420

October 9, 2003

Matt King

Plant I.D. # 21-101-00119

Application Log # 53835

SOURCE DESCRIPTION:

Bakery Feeds operates a bakery scrap operation. The bakery scrap operation dries scrap breads and dough. This dried dough is sized to form cookie meal and distributed to the customers. A VOC emission limit of 90 tons per year is required to preclude major source classification.

COMMENTS:

- I. Type of control
The 90 ton per year VOC limit will prevent the bakery scrap drying from being considered a major source. Therefore, the Regenerative Thermal Oxidizer originally proposed in the permit application is not required.
- II. Emission factors
Emission factors were obtained from AP-42. A more thorough description of VOC emissions calculation is contained in the EPA document Alternative Control Technology Document for Bakery Oven Emissions.
- III. Applicable regulations
Regulations 401 KAR 63:010 is applicable to both emission points one and four, product unloading and loadout respectively. Regulations 401 KAR 59:010 and 59:020 apply to the bakery scrap drying process. Regulation 59:010 applies to the mixing and sizing process.
- IV. Emission and Operating Caps description
In order to preclude major source classification under Title V and 401 KAR 50:012, the VOC emissions shall not exceed 90 tons per year.

RESPONSE TO COMMENTS:

The draft permit and supporting material was made available for public review and comment during the period of September 4 to October 4, 2003. No comments were received during this period.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.